

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

TERRY LOCKLEAR, individually and)
on behalf of all others similarly situated,)
)
Plaintiff,)
)
v.) Case No. 1:14-cv-00744-SCJ
) Honorable Steve C. Jones
DOW JONES & COMPANY, INC.,)
)
)
Defendant.)
)

**CONSENT MOTION FOR LEAVE TO
TO FILE OVERSIZED BRIEFS**

Plaintiff Terry Locklear (“Plaintiff”) and Defendant Dow Jones & Company, Inc. (“Dow Jones”), by and through their undersigned counsel, hereby move pursuant to Local Rule 7.1(D), for leave to file Plaintiff’s Response in Opposition to Defendant’s Motion to Dismiss in excess of the Court’s 25-page limit and Defendant’s Reply in Support of Motion to Dismiss in excess of the Court’s 15-page limit. In support of the instant motion, the parties state as follows:

1. On June 2, 2014, Plaintiff filed her First Amended Class Action Complaint and Demand for Jury Trial (the “Complaint”). (Dkt. 18.)
2. On June 23, 2014, Dow Jones filed its Motion to Dismiss Plaintiff’s

Complaint (the “Motion”) pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). (Dkt. 21.)

3. In its Motion, Defendant raised several complex legal and factual issues regarding the adequacy of Plaintiff’s Complaint.

4. In order to adequately address those arguments, Plaintiff requires an additional five (5) pages beyond the limits specified by Local Rule 7.1(D) and Dow Jones does not object provided that it also receives an additional five (5) pages for its Reply.

5. The relief requested herein is not sought for any improper purpose and in light of the foregoing, good cause exists to grant the instant motion.

6. Attached hereto as Exhibit A is a true and accurate copy of Plaintiff’s proposed Response in Opposition to Defendant’s Motion to Dismiss.

WHEREFORE, the Parties respectfully stipulate and request that the Court enter an Order (i) granting Plaintiff leave to file an opposition brief in response to Defendant’s pending Motion to Dismiss in excess of twenty-five, and no greater than thirty, pages, *instanter*; (ii) granting Defendant leave to file its reply in support of its pending Motion to Dismiss in excess of fifteen, and no greater than twenty, pages; and (iii) providing such other and further relief as the Court deems

reasonable and just.¹

Respectfully submitted, this July 21, 2014.

s/ J. Dominick Larry

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¹ A Proposed Order is attached hereto as Exhibit B.

s/ Anthony Eliseuson

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Attorneys for Defendant Dow Jones & Company, Inc.

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), the undersigned counsel for Plaintiff certifies that the pleading has been prepared in Times New Roman, 14-point type, which is of the font selections approved by the Court in Local Rule 5.1(B).

s/ J. Dominick Larry _____

CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2014, I electronically filed the above and foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/ J. Dominick Larry